

IN THE UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF
MARYLAND
(Northern Division)

IN THE MATTER OF THE PETITION

OF

GRACE OCEAN PRIVATE LIMITED,
as owner of the M/V DALI,

CASE NO. JKB-24-cv-941

IN ADMIRALTY

AND

SYNERGY MARINE PTE LTD,
As Manager of the M/V DALI,

Seeking Exoneration from or Limitation of
Liability

**VERIFIED CLAIM OF RESPONDENT STATE FARM INSURANCE
COMPANIES AS SUBROGEE OF MARIA HUNTER**

Respondent, State Farm Insurance Companies a/s/o Maria Hunter by and through undersigned counsel, and pursuant to this Court's Order (ECF No. 5) and the Federal Rules of Civil Procedure Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, specifically Rule F(5), in response to Complainant's Complaint, state:

Factual Background

1. Petitioners are Grace Ocean Private Limited as owner of the M/V Dali (the "Vessel") and Synergy Marine PTE LTD. as manager of the M/V Dali (hereinafter, "Petitioners").

2. Claimant State Farm Insurance Companies Insurance Company is an Illinois Corporation with a principal place of business located in Bloomington, IL.

3. At all times material hereto, Maria Hunter owned a 2020 Nissan MAXIMA VIN: 1N4AA6DV7LC368825 ("Hunter Vehicle").

4. At all times material hereto, State Farm was authorized to issue an automobile policy that covered the Vehicle to Maria Hunter and issued said policy under Policy 1997-849-20D ("the Policy").

5. Upon information and belief, at all times relevant hereto, Grace Ocean Private Limited as owner of the M/V Dali and Synergy Marine PTE LTD. as manager of the M/V Dali.

6. On or about March 26, 2024, the Hunter Vehicle was located on the Francis Scott Key Bridge.

7. On said date, the Vessel collided with the Francis Scott Key Bridge, thereby causing it to collapse damaging several vehicles including the Hunter Vehicle.

8. The collision between the Vessel and the bridge that resulted in damage to the Hunter Vehicle, was caused by the careless, negligent, or reckless acts or omissions of Petitioners and/or its agents.

Claimed Damages to Hunter Vehicle

9. State Farm conducted a survey of the damage sustained to the Hunter Vehicle. The Hunter Vehicle was deemed a total loss. The estimates the damages to be \$20,264.80 inclusive of Ms. Hunter's \$100.00 deductible. A copy of the supporting estimates of the damage to the Vehicle are attached hereto and incorporated herewith as Exhibit 1.

Claims

10. As a result of the above-described occurrence, Respondent sustained and therefore claimed Twenty Thousand Two Hundred and Sixty-Four and 80/100 (\$20,264.80).

WHEREFORE, Respondent State Farm Insurance Companies, proceeding as subrogee of Maria Hunter, demands judgment against Complainant for all claims as evidenced and contained herein.

Dated: September 24, 2024

Respectfully submitted,

/s/ Charles J. Fratus, Esq.
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VERIFICATION FOR VERIFIED CLAIMS OF
RESPONDENT

I DO SOLEMNLY AFFIRM under the penalties of perjury that the above statements are true to the best of my knowledge, information and belief.

/s/ Charles J. Fratus
Charles J. Fratus (Bar No. 13169)

CERTIFICATE OF SERVICE

I hereby certify that, on the 24th of September, 2024 I electronically filed the foregoing Verified Claim of Claimant, State Farm Insurance Companies via the CM/ECF system which will be sent electronically to counsel who are registered participants identified on the Notice of Electronic Filing.

/s/ Charles J. Fratus

Charles J. Fratus (Bar No. 13169)